

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

In re:

AMY C. NIXON,
Debtor.

Chapter 13
Case No. 09-19877-FJB

**TRUSTEE'S RESPONSE TO DEBTOR'S
MOTION TO REINSTATE**

Now comes Carolyn A. Bankowski, Standing Chapter 13 Trustee ("Trustee"), and objects to the Debtor's Motion to Reinstate ("the Motion"), and states as follows:

1. The Trustee has no objection to the Motion per se, or to the reinstatement of the case.
2. However, according to the Amended Plan filed on April 1, 2010, the Debtor should have paid a total of \$865.00 in plan payments. To date, the Debtor has only paid a total of \$204.00. As such, the Debtor is currently in arrears in the amount of \$661.00 which equals 3.8 months of plan payments.
3. The Trustee therefore requests that if the Court grants the Motion and reinstates the case, that it be on the condition that the Debtor immediately cure the arrears, and that the Court grant such other relief as this Court deems proper.

Dated: April 5, 2010

Respectfully submitted,
Carolyn A. Bankowski
Standing Chapter 13 Trustee
/s/ Patricia A. Remer
Carolyn A. Bankowski, BBO#631056
Patricia A. Remer, BBO#639594
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 5, 2010, a copy of the Trustee's Response to Debtor's Motion to Reinstate was served via first class mail postage prepaid, or by electronic notice, upon the debtor and debtor's counsel at the addresses set forth below.

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/s/ Patricia A. Remer
Patricia A. Remer, BBO#639594